

1 function of every position at World Vision on account of merely working “in a Christian organization
2 and bearing witness of Christ.” *Id.* at 17:3-21. Freiberg testified that every customer service
3 representative or trainee was required to attend “devotions” when the “entire donor contact center
4 shuts down.” *Id.* at 43:18-44:3. Freiberg characterized participating in devotions as an “indirect”
5 way in which World Vision staff members teach the word of the Lord and that this is accomplished
6 through “sharing Scripture” or “things that they have heard [] within their church.” *Id.* at 16:4-16.
7 Freiberg believes teaching the word of the Lord is a main function simply by virtue of “being
8 Christian,” *Id.* at 18:7-21, and being a “representative of Christ.” *Id.* at 16:22-25.

9 A document entitled “WVUS Devotion Guidelines” is disseminated to all World Vision staff
10 members, Dkt. No. 28 at ¶ 55. It sets forth World Vision employees’ responsibilities regarding
11 “leading devotions.” “Leadership of devotions” is “a part of *every* WVUS job description” and it is
12 contemplated that leading devotions rotates among all staff members. Dkt. No. 28-31 at 23(emphasis
13 added). These Guidelines also state that for staff members who are not comfortable leading
14 devotions, it is suggested they “ask [] another staff member to co-lead with them.” When Freiberg
15 was asked whether leading devotions was an obligatory function of a customer service
16 representative, she responded unequivocally at her initial deposition—which was held on February
17 16, 2023—that the expectation is to “*participate* in devotions” rather than to lead. Exh. 13, at 22:5-
18 16. She also testified that each team within World Vision determines whether the responsibilities of
19 leading those devotions are shared among team members. Exh. 13, at 22:15-19. Further, when asked
20 whether it would be a disqualifier for employment if an employee outright refused to lead as opposed
21 to being merely a participant, Freiberg replied: “To lead a devotion ... would not be a required
22 expectation.” Exh. 13, at 23:16-25:18.

23 However, at Freiberg’s second deposition—which was conducted March 10, 2023—she
24 contradicted her prior testimony that the leading of devotions was an encouraged task rather than a
25 required one. She testified on March 10, 2023, that every customer service representative or trainee
26 is “required to attend devotions and to ultimately lead devotions.” Exh. 10, at 43:18-20. A party